

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

KENDRA HARPER, *individually and on behalf of
all others similarly situated,*

Plaintiff,

v.

NBI, INC.

Defendant.

**ORAL ARGUMENT
REQUESTED**

Judge William Conley

Magistrate Judge Anita Boor

Case No. 24-CV-00644

DECLARATION OF GERALD L. MAATMAN, JR.

I, Gerald L. Maatman, Jr., declare:

1. I am over the age of 18, and I have personal knowledge of the facts set forth in this declaration. I submit this declaration in support of Defendant NBI, Inc.'s Motion to Stay Discovery.

2. I am an attorney with Duane Morris LLP. I represent Defendant NBI, Inc. ("Defendant" or "NBI") in the above-captioned action.

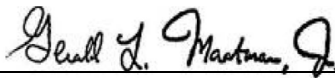
3. On November 13, 2024, counsel for Defendant conducted a Rule 26(f) conference with counsel for Plaintiff Kendra Harper ("Plaintiff" or "Harper"). At that conference, counsel for Plaintiff advised NBI that it opposes a stay of discovery pending a ruling on Defendant's motion to dismiss.

4. On November 20, 2024, Harper emailed NBI her first set of Requests for Production and first set of Interrogatories. A true and accurate copy of Plaintiff's First

Set of Requests for Production are attached hereto as **Exhibit A**. A true and accurate copy of Plaintiff's First Set of Interrogatories are attached hereto as **Exhibit B**.

I declare under penalty of perjury under the laws of Illinois, and pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed on November 25, 2024.

s/ 
Gerald L. Maatman, Jr.